

BILAL A. ESSAYLI
Acting United States Attorney
JOSEPH T. MCNALLY
Assistant United States Attorney
Acting Chief, Criminal Division
KYLE W. KAHAN (Cal. Bar No. 298848)
KELLYE NG (Cal. Bar No. 313051)
JASON A. GORN (Cal. Bar No. 296179)
Assistant United States Attorneys
1400/1300/1200 United States Courthouse
312 North Spring Street
Los Angeles, California 90012
Telephone: (213) 894-2238/7962/8408
Facsimile: (213) 894-0142
E-mail: kyle.kahan@usdoj.gov
kellye.ng@usdoj.gov
jason.gorn@usdoj.gov

Attorneys for Plaintiff
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL LERMA, et al.,

Defendants.

No. 2:18-CR-00172-GW-1, 6, 7, 8

THIRD STIPULATION REGARDING THE
FILING OF RULE 29 AND 33 MOTIONS,
THE HEARING ON POST-TRIAL MOTIONS,
AND SENTENCING HEARING

Plaintiff United States of America, by and through its counsel
of record, the Acting United States Attorney for the Central District
of California and Assistant United States Attorneys Kyle W. Kahan,
Kellye Ng, and Jason A. Gorn; defendant Michael Lerma, by and through
his counsel of record, Marri B. Derby and Joel M. Furman; defendant
Carlos Gonzalez, by and through his counsel of record, Richard G.
Novak and Kenneth M. Miller; defendant Jose Valencia Gonzalez, by and
through his counsel of record, Shaun Khojayan and Daniel A. Nardoni;
and defendant Juan Sanchez, by and through his counsel of record,
Charles P. Diamond and Amy R. Lucas (collectively, "defendants"),

1 hereby stipulate to continue the briefing and hearing schedule
2 regarding Rule 29 and 33 motions and the sentencing date based on the
3 following facts:

4 1. On April 2, 2025, the Court issued an order setting the
5 briefing deadline for defendants' Rule 29/33 motions to be due on
6 July 28, 2025; oppositions due on August 25, 2025; replies due on
7 September 15, 2025; and the hearing on October 16, 2025. (Dkt.
8 1758.)

9 2. On July 18, 2025, the Court issued an order amending the
10 briefing deadline for defendants' Rule 29/33 motions to be due on
11 September 22, 2025; oppositions due on October 20, 2025; replies due
12 on November 10, 2025; the hearing on the Rule 29/33 post-trial
13 motions to be set for December 8, 2025; sentencing papers due on
14 December 29, 2025; and the sentencing hearing to be set for January
15 5, 2026, at 8:00 a.m. (Dkt. 1775.)

16 3. Between September 21 through 23, 2025, defendants filed
17 their post-trial motions under Rule 29 and 33. (See Dkts. 1799,
18 1800, 1801, 1802, 1803, 1804, 1810; see also Joinders at Dkt. 1805,
19 1807, 1808, 1809.)

20 4. On October 14, 2025, counsel for the government conferred
21 with defendants' counsel regarding an extension of time to respond to
22 the defendants' post-trial motions. The defense does not oppose the
23 government's first request for an extension of time and the parties
24 stipulate to the following briefing and hearing schedule:

25 a. The government's deadline for its oppositions to the
26 defense's post-trial motions under Rule 29 and 33 will be filed by
27 November 3, 2025.

1 b. The defendants' deadline for their replies in support
2 of their post-trial motions under Rule 29 and 33 will be filed by
3 November 24, 2025.

4 c. The hearing on defendants' post-trial motions under
5 Rule 29 and 33 will be on January 5, 2026, at 8:00 a.m.

6 5. On October 15, 2025, counsel for the government conferred
7 with defendants' counsel regarding continuing the sentencing hearing.
8 The defense does not oppose a continuance and the parties stipulate
9 to the following briefing and hearing schedule:

10 a. The parties' sentencing briefing is due on January 15,
11 2026.

12 b. The sentencing hearing will be continued from January
13 5, 2026, to January 22, 2026, at 8:00 a.m.

14 IT IS SO STIPULATED.

15 Dated: October 16, 2025

Respectfully submitted,

16 BILAL A. ESSAYLI
17 Acting United States Attorney

18 JOSEPH T. MCNALLY
19 Assistant United States Attorney
20 Acting Chief, Criminal Division

21 _____
22 /s/
23 KYLE W. KAHAN
24 KELLYE NG
25 JASON A. GORN
26 Assistant United States Attorneys

27 Attorneys for Plaintiff
28 UNITED STATES OF AMERICA

/s/ (with email authorization)
MARRI B. DERBY
JOEL FURMAN

Attorneys for Defendant
MICHAEL LERMA

/s/ (with email authorization)
SHAUN KHOJAYAN
DANIEL A. NARDONI

Attorneys for Defendant
JOSE VALENCIA GONZALEZ

/s/ (with email authorization)
RICHARD G. NOVAK
KENNETH M. MILLER

Attorneys for Defendant
CARLOS GONZALEZ

/s/ (with email authorization)
CHARLES P. DIAMOND
AMY R. LUCAS
RICHARD P. LASTING

Attorneys for Defendant
JUAN SANCHEZ